



U.S. Department of Justice

United States Attorney
Southern District of New York

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New York, New York 10007

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August 27, 2012

BY HAND

The Honorable Paul A. Engelmayer
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

MEMO ENDORSED

Re: **United States v. Lebanese Canadian Bank SAL et al.,**
11 Civ. 9186 (PAE)

Dear Judge Engelmayer:

Please find attached for the Court's consideration a proposed Stipulation and Order of Settlement (the "Proposed Order") relating to H&D Export & Import, Inc. d/b/a EIBO Auto Exchange ("H&D"). The Proposed Order provides for the forfeiture of all funds in a particular H&D bank account (the "Proposed Forfeited Funds").

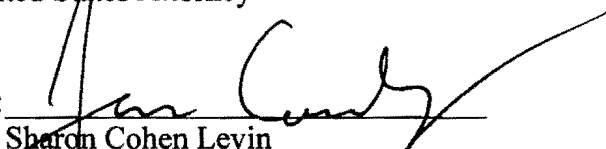
On May 30, 2012, certain insurance companies (the "Insurance Company Claimants") filed claims in this action for, inter alia, all assets of H&D, including the Proposed Forfeited Funds. Counsel for the Insurance Company Claimants has indicated that the Insurance Company Claimants have no objection to the entry of the Proposed Order as long as the Proposed Forfeited Funds are maintained by the United States until the claims of the Insurance Company Claimants to those funds are resolved in this action and provided that the Order is without prejudice to any claim they may have to the Proposed Forfeited Funds in this action or any claim in any other action.

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The Government respectfully requests that the Court (1) enter the Proposed Order, and (2) so order that the Proposed Forfeited Funds be maintained by the United States during the pendency of the Insurance Company Claimants' claims in this action for the Proposed Forfeited Funds.

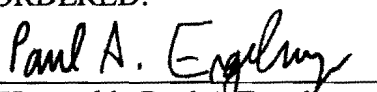
Respectfully submitted,

PREET BHARARA
United States Attorney

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*The Proposed Forfeited Funds must be maintained
by the United States during the pendency of the
Insurance Company Claimants' claims in this action.*

SO ORDERED:

 8/28/2012
The Honorable Paul A Engelmayer
United States District Judge